

## **REMARKS**

Reconsideration of the application in view of the present amendment is respectfully requested.

By the present amendment, Claims 1-5 have been canceled. Claims 6-10 have been added.

Based on the foregoing amendments and the following remarks the application is deemed to be in condition for allowance and action to that end is respectfully requested.

The Examiner rejected claims 2 and 4 under 35 U.S.C. §102(b) as being anticipated by Yoshimura, et al., U.S. Patent No. 6,237,205 (Yoshimura), and rejected claims 1, 3 and 5 under 35 U.S.C. §103(a) as being unpatentable over Yoshimura in view of Nishi, et al., U.S. Patent No. 5,495,736 (Nishi). Claims 1-5, as noted above, have been canceled. It is respectfully submitted that the new claims 6-10 are patentable over the prior art, including all of the prior art of record in this application.

Specifically, claim 6 recites that the welding apparatus is arranged downstream of both unwinding reels, and a strip store is provided between the welding apparatus and the rolling mill stand.

As discussed, in the specification, the inventive installation permits to effect a continuous rolling of the strip, with reduce quantity of the waste length, and with the strip beginning and the strip end being always rolled off under optimal tension conditions (page 5, second paragraph).

Yoshimura discloses a completely different structure. In Yoshimura, the welding apparatus is arranged between a first unwinding reel (1) and a second twin unwinding reel arrangement consisting of two unwinding reels (11, 20) mounted on a pivotal common frame (21). Yoshimura does not disclose a strip store located downstream of all of the unwinding reels and which is capable to bridge a time span associated with welding of the beginning of the another of the first and second strips with the end of the one of the first and second strips.

The Federal Circuit has mandated that 35 U.S.C. §102 require no less than “complete anticipation... [a]nticipation requires the presence in a single prior art disclosure of all elements of a claimed invention arranged as in the claim.”

Connell v. Sears, Roebuck & Co., 220 U.S.P.Q. 193, 198 (Fed. Cir. 1983); See also, Electro Medical Systems S.A. v. Cooper Life Sciences, 32 U.S.P.Q.2d 1017, 1019 (Fed. Cir. 1994); Verdegaal Bros., Inc. v. Union Oil Co., 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987).

Yoshimura does not disclose rolling installation as claimed. Since Yoshimura fails to disclose each and every feature of independent Claim 6,

Yoshimura, as a matter of law, does not anticipate the present invention, as defined by said independent claim.

In view of the above, it is respectfully submitted that Yoshimura does not anticipate or make obvious the present invention as defined in Claim 6, and the present invention is patentable over Yoshimura.

Nishi likewise does not disclose a rolling installation as claimed.

It is respectfully submitted that claim 6 is allowable.

Claims 7-9 depend on claim 6 and are allowable of the same reason claim 1 is allowable and further because of specific features recited therein which, when taken alone and/or in combination with those of claim 6, are not disclosed or suggested in the prior art.

Claim 10 is directed to a method of rolling a strip using the installation of claim 6 and is likewise allowable for the same reason claim 6 is allowable. Further claim 10 recites the step of welding a beginning of another of the first and second strips to an end of the one of the first and second strips before a last pass of the one of the first and second strips through the rolling mill stand while actuating the strip store to bridge a time span associated with welding of the beginning of the another of the first and second strips with the end of the one of the first and second strips.

Neither Yoshimura nor Nishi discloses the method of claim 10.

## **CONCLUSION**

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance, and allowance of the application is respectfully requested.

Should the Examiner require or consider it advisable that the specification, claims and/or drawings be further amended or corrected in formal respects in order to place the case in condition for final allowance, it is respectfully requested that such amendment or correction be carried out by Examiner's Amendment and the case passed to issue. Alternatively, should the Examiner feel that a personal discussion might be helpful in advancing this case to allowance, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

Alexander Zinchuk

Alexander Zinchuk  
Reg. No. 30,541

Abelman, Frayne & Schwab  
666 Third Avenue, 10<sup>th</sup> Floor  
New York, NY 10017-5621  
212-885-9383